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16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**

18 LOS ANGELES WATERKEEPER, A
19 California non-profit corporation,
20 COASTKEEPER ALLIANCE, A California
21 non-profit corporation,

22 Plaintiffs,

23 vs.

24 ESTES EXPRESS LINES, INC., a
25 Maryland corporation,

26 Defendant.

Case No.: 2:22-cv-07537-MWF-MAR

**NOTICE OF TENTATIVE
SETTLEMENT**

1 PLEASE TAKE NOTICE that the parties have reached a *tentative* settlement in
2 this proceeding. Their agreement is reflected in the proposed Consent Decree attached to
3 this notice as “**Exhibit 1**,” a copy of which has been sent to the United States Department
4 of Justice (“DOJ”) and the United States Environmental Protection Agency (“EPA”) for a
5 45-day review period as required under section 135.5 of Title 40 of the Code of Federal
6 Regulations. Plaintiff will provide the Court with the written notice of commencement of
7 the 45-day review period once Plaintiff receives that notice from DOJ. At the end of the
8 45-day review period, Plaintiff will notify the Court of any objections received from the
9 reviewing agencies and will submit the proposed Consent Decree for consideration and
10 approval by this Court.

11 Should the Court require any additional information, the undersigned will be
12 pleased to provide it upon request.

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15 Dated: December 19, 2022

Respectfully submitted,

16
17 /s Anthony M. Barnes
18 Anthony M. Barnes
19 AQUA TERRA AERIS LAW GROUP
20 Attorneys for Plaintiffs
21 Los Angeles Waterkeeper and California
22 Coastkeeper Alliance
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